

**MEMO ENDORSED**

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Avenue • Suite 2525 • New York, New York 10170  
T: 212.792-0046 • E: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

September 15, 2020

**Via Electronic Filing**

Hon. Valerie E. Caproni, United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 9/15/2020

Re: *Solomon v. Szymanski et al*  
**Case No.: 20-cv-05449-VEC**

Dear Honorable Judge Caproni:

This law firm represents Plaintiff Allen Solomon (the “**Plaintiff**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Rules 2(A) and (C), this letter respectfully serves as a request to extend Plaintiff’s deadline to respond to the motion to dismiss [Dckt. No. 17] filed by Defendants Curt Szymanski and Caffeination Title, LLC (together, the “**Defendants**”) from September 21, 2020 to, through and including October 23, 2020.

This is the first request of its nature and would not affect any other scheduled deadlines. This request is made on consent of Plaintiff.

The basis for the request is that the parties wish to exhaust all alternative dispute resolution efforts at the upcoming mediation, currently scheduled for September 22, 2020, before incurring substantial costs and expenses in motion practice.

Thus, Plaintiff respectfully requests that the deadline to respond to Defendants’ motion to dismiss [Dckt. No. 17], be extended from September 21, 2020 to, through and including October 23, 2020.

Thank you, in advance, for your time and attention.

Application GRANTED. Plaintiff’s deadline to respond to Defendants’ motion to dismiss is extended to **October 23, 2020**. Defendants’ reply is due by **October 30, 2020**.

SO ORDERED.



9/15/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein  
Joshua D. Levin-Epstein  
420 Lexington Avenue, Suite 2525  
New York, New York 10170  
Tel. No.: (212) 792-0048  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)  
*Attorneys for Plaintiff*

Cc: All Counsel (via ECF)